

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**CSX TRANSPORTATION, INC.,  
individually and on behalf of  
NORFOLK AND PORTSMOUTH BELT LINE  
RAILROAD COMPANY,**

**Plaintiff,**

**v.**

**Civil Action No. 2:18-cv-530-MSD-LRL**

**NORFOLK SOUTHERN RAILWAY COMPANY, *et al.*,**

**Defendants.**

**DEFENDANT NORFOLK AND PORTSMOUTH BELT LINE  
RAILROAD COMPANY'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON DAMAGES**

Defendant Norfolk and Portsmouth Belt Line Railroad Company, by counsel, moves for partial summary judgment dismissing all monetary damages asserted by plaintiff CSX Transportation Inc. for failure to disclose any damages computation as required by Rule 26(a)(1)(A)(iii). In support thereof, the Belt Line submits the accompanying memorandum.

Dated: January 6, 2020

**NORFOLK AND PORTSMOUTH  
BELT LINE RAILROAD COMPANY**

By: /s/ James L. Chapman, IV  
James L. Chapman, IV, VSB No. 21983  
W. Ryan Snow, VSB No. 47423  
Darius K. Davenport, VSB No. 74064  
David C. Hartnett, VSB No. 80452  
CRENSHAW, WARE & MARTIN, P.L.C.  
150 W. Main Street, Suite 1500  
Norfolk, Virginia 23510  
Telephone: (757) 623-3000  
Facsimile: (757) 623-5735  
[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)  
[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)  
[ddavenport@cwm-law.com](mailto:ddavenport@cwm-law.com)  
[dhartnett@cwm-law.com](mailto:dhartnett@cwm-law.com)

**CERTIFICATE OF SERVICE**

I certify that on this 6th day of January 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a “Notice of Electronic Filing” to all counsel of record who have consented to electronic service.

By: /s/ James L. Chapman, IV  
James L. Chapman, IV, VSB No. 21983  
CRENSHAW, WARE & MARTIN, P.L.C.  
150 W. Main Street, Suite 1500  
Norfolk, Virginia 23510  
Telephone: (757) 623-3000  
Facsimile: (757) 623-5735  
[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)  
*Attorney for Norfolk and Portsmouth Belt  
Line Railroad Company*